

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re Karla Scioscia,
Debtor

Chapter 7

Karla Scioscia,
Movant
v.

Case No. 5:14-bk-04887

Cavalry SPV I, LLC
Respondent

DEBTOR'S MOTION TO AVOID LIEN

1. Debtor, Karla Scioscia, commenced this case on October 22, 2014, by filing the above-numbered voluntary petition for relief under Chapter 7 of Title 11, United States Code.
2. This motion is filed pursuant to 11 U.S.C. § 522(f) and 722 to avoid and cancel any and every lien held by Respondent on personal property in which Debtor has an ownership interest.
3. Respondent has a judicial lien on Debtor's checking account located at PNC Bank, 136 South Main Avenue, Scranton, PA 18504.
4. Debtor's interest in the property referred to in the preceding paragraph and encumbered by the lien has been claimed as fully exempt in the bankruptcy case.
5. The existence of a lien of Respondent on Debtor's personal property would impair exemptions to which the Debtor would be entitled under 11 U.S.C. § 522(d).
6. As Respondent's lien is a non-purchase money security interest, that lien is avoidable pursuant to 11 U.S.C. § 522(f).

WHEREFORE, Debtor respectfully requests an Order against Respondent for the cancellation and avoidance of the lien on the personal property described above, and for such additional or alternative relief as may be just and proper.

s/ Brett Freeman

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